

Case 1:20-cr-00140-DCN \*SEALED\* Document 4 Filed 07/15/20 Page 1 of 1

UNITED STATES DISTRICT COURT  
DISTRICT OF IDAHO

UNITED STATES OF AMERICA

*WARRANT FOR ARREST*

v.

RYAN M TICHY

1:20-cr-00140-DCN

To: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest RYAN M TICHY and bring forthwith to the  
nearest magistrate judge to answer an **INDICTMENT** charging with the below listed violations.

18 U.S.C. § 1343 WIRE FRAUD

18 U.S.C. § 1028A AGGRAVATED IDENTITY THEFT

42 U.S.C. § 408(a)(7)(B) FALSE REPRESENTATION OF A SOCIAL SECURITY NUMBER



United States Courts  
District of Idaho  
**ISSUED**  
*Crystal Hall*  
on Jul 15, 2020 9:37 am

Crystal Hall, Deputy Clerk

July 15, 2020

Name and Title of Issuing Officer

Date

**RETURN**

This warrant was received \_\_\_\_\_ and executed with the arrest of the above-name  
individual at \_\_\_\_\_.

\_\_\_\_\_  
Signature of Arresting Officer

\_\_\_\_\_  
Date of Arrest

\_\_\_\_\_  
Name & Title of Arresting Officer

BART M. DAVIS, IDAHO STATE BAR NO. 2696  
UNITED STATES ATTORNEY  
DARCI W. CRANE, IDAHO STATE BAR NO. 8852  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF IDAHO  
1290 W. MYRTLE ST. SUITE 500  
BOISE, ID 83702-7788  
TELEPHONE: (208) 334-1211  
FACSIMILE: (208) 334-1413

**U.S. COURTS**

Recd \_\_\_\_\_ Filed \_\_\_\_\_ Time \_\_\_\_\_  
JUL 14 2020  
STEPHEN W. KENYON  
CLERK, DISTRICT OF IDAHO

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN M TICHY,

Defendant.

Case No. **CR 20-0140-S DCN**

**INDICTMENT**

18 U.S.C. § 1343  
18 U.S.C. § 1028A  
42 U.S.C. § 408(a)(7)(B)  
18 U.S.C. § 981(a)(1)(C)  
28 U.S.C. § 2461(c)  
18 U.S.C. § 982(a)

The Grand Jury charges:

**COUNTS ONE THROUGH FIVE**

**Wire Fraud**  
**18 U.S.C. § 1343**

1. On a date unknown, but from at least May 2018 to in or about December 2019, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, knowingly devised, participated in, and intended to devise a scheme and plan to defraud, individuals, retail

merchants, and financial institutions, as to material matters and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

*Manner and Means*

2. In order to further the objects and goals of the scheme, the defendant, RYAN M TICHY, used the following manner and means, among others:
  3. TICHY obtained the means of identification of an unknown number of specific, individual victims, including their names, social security numbers, dates of birth, and account numbers.
  4. TICHY obtained false identification documents, including counterfeit driver's licenses with victim's names but with his photograph.
  5. TICHY obtained existing credit account information for individual victims.
  6. TICHY applied for, and sometimes successfully obtained, credit and loan accounts using other individuals' means of identification.
  7. TICHY used the fraudulently created and stolen credit and loan accounts to make purchases at different retail merchants, hotels, and other places of business.
  8. TICHY travelled around Washington and to Idaho, Oregon, Nevada, and elsewhere, to make fraudulent purchases.

*Executions of the Scheme*

9. On or about the dates listed below, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in

interstate commerce the signals and sounds described below, each transmission constituting a separate count of this Indictment:

Count	Date	Location	Account used	Amount (Approx.)
1	2/12/2019	Bobbi Bullock Medical Esthetics, 1112 W Main St., Boise, ID	account ending 4861	\$2,501.25
2	3/27/2019	Bretz R.V. & Marine, 4180 S Broadway Ave., Boise, ID	loan application	\$14,387.00
3	4/2/2019	Bretz R.V. & Marine, 4180 S Broadway Ave., Boise, ID	account ending 0501	\$1,216.69
4	4/1/2019	Campbell Tractor Company, 2014 N Franklin Blvd., Nampa, ID	account ending 7795	\$2,118.48
5	11/4/2019	Sportsman's Warehouse, 3797 E. Fairview Ave., Meridian, ID	account ending 0996	\$1,000

All in violation of Title 18, United States Code, Section 1343.

NINE  
COUNTS SIX THROUGH TEN

TWM  
7/14/2020

**Aggravated Identity Theft  
18 U.S.C. § 1028A**

10. Paragraphs 1 though 9 of this Indictment are realleged and incorporated by reference as though fully set forth herein.
11. On or about the dates listed below, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, did knowingly and willfully transfer, possess, and use without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), knowing that the means of identification belonged to another actual person, described below for each count:

Count	Underlying Count	Victim Initials	Date of Use	Means of Identification
6	1	C.M.	2/8/2019	Name, DOB
7	2	J.B.	3/27/2019- 4/2/2019	Name, DOB, SSN
8	4	J.B.	4/1/2019	Name, DOB, SSN
9	5	M.L.	11/4/2019	Name, DOB, SSN

All in violation of Title 18, United States Code, Section 1028A.

**COUNT TEN**

**False Representation of a Social Security Number**  
**42 U.S.C. § 408(a)(7)(B)**

On or about March 27, 2019, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, for the purpose of obtaining something of value and for any other purpose, with the intent to deceive, falsely represented XXX-XX-1894, to be the social security account number assigned by the Commissioner of Social Security to him in an application at Bretz R.V. and Marine, located in Boise, Idaho, for credit, when in fact, such number was not the social security account number assigned to the defendant by the Commissioner of Social Security, all in violation of Title 42, United States Code 408(a)(7)(B).

**COUNT ELEVEN**

**False Representation of a Social Security Number**  
**42 U.S.C. § 408(a)(7)(B)**

On or about November 4, 2019, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, for the purpose of obtaining something of value and for any other purpose, with the intent to deceive, falsely represented XXX-XX-3662 to be the social security account number assigned by the Commissioner of Social Security to him in an application for credit associated with Sportsman's Warehouse, located in Meridian, Idaho, when in fact, such number was not the

social security account number assigned to the defendant by the Commissioner of Social Security, all in violation of Title 42, United States Code 408(a)(7)(B).

**CRIMINAL FORFEITURE ALLEGATION**

**Wire Fraud Forfeiture  
18 U.S.C. § 981(a)(1)(C)/28 U.S.C. § 2461(c)/18 U.S.C. § 982(a)**

Upon conviction of the offenses alleged in Counts One through Five of this Indictment, the defendant, RYAN M TICHY, shall forfeit to the United States any and all property, real and personal, tangible and intangible, consisting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the foregoing offenses. The property to be forfeited includes, but is not limited to, the following:

1. Unrecovered Cash Proceeds. The defendant obtained and controlled unrecovered proceeds of the offense of conviction, or property derived from or traceable to such proceeds, and property the defendant used to facilitate the offense, but based upon actions of the defendant, the property was transferred, diminished, comingled, or is otherwise unavailable.

2. Substitute Assets. Pursuant to 21 U.S.C. § 853(p) and other applicable statutes, the government will seek forfeiture of substitute assets, “or any other property of the defendant” up to the value of the defendant’s assets subject to forfeiture. The government will do so when the property subject to forfeiture cannot be forfeited for one or more of the following reasons:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty.

Dated this 14th day of July, 2020.

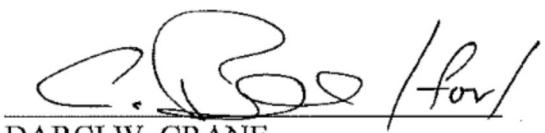
A TRUE BILL

*/s/ [signature on reverse]*

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FOREPERSON

BART M. DAVIS  
UNITED STATES ATTORNEY  
By:

  
\_\_\_\_\_  
DARCI W. CRANE  
ASSISTANT UNITED STATES ATTORNEY

## CRIMINAL COVERSHEET

DEFENDANT'S NAME: <b>Ryan M. Tichy</b> DEFENSE ATTORNEY: Address: <b>U.S. COURTS</b>	JUVENILE: No  PUBLIC or SEALED: Sealed SERVICE TYPE: Warrant (Summons or Warrant or Notice (if Superseding))  ISSUE: Yes
Telephone No.: <u>Revd</u> _____ <u>Filed</u> _____ <u>Time</u> _____  <b>STEPHEN W. KENYON</b> <b>CLERK, DISTRICT OF IDAHO</b>	INVESTIGATIVE AGENT: Matt Lavelle  Telephone No.: (208) 423-4287  AGENCY: Social Security Administration/OIG
CASE INFORMATION:	RELATED COMPLAINT: No CASE NUMBER: <b>CR 20-0140-S DCN</b>

## CRIMINAL CHARGING INFORMATION

CHARGING DOCUMENT: Indictment			
Felony: <u>Yes</u>		County of Offense: <u>Ada</u>	
Class A Misdemeanor: <u>No</u>		Estimated Trial Time: <u>5 days</u>	
Class B or C Misdemeanor: <u>No</u> (Petty Offense)			
STATUTE (Title and Section(s))	COUNT/ FORFEITURE ALLEGATION	BRIEF DESCRIPTION	PENALTIES (Include Supervised Release and Special Assessment)
18 U.S.C. § 1343	ONE through FIVE	Wire Fraud	20 years, not more than 3 years Supervised Release, \$250,000 fine, \$100 Special Assessment
18 U.S.C. § 1028A	SIX through NINE	Aggravated Identity Theft	Mandatory minimum of 2 years imprisonment consecutive to other non- 1028A sentence, 1 year Supervised Release, \$250,000 Fine, \$100 Special Assessment
42 U.S.C. § 408(a)(7)(B)	TEN and ELEVEN	Fraudulent Representation of a Social Security Number	5 years, 3 years Supervised Release, \$250,000 Fine, \$100 Special Assessment
18 U.S.C. § 981(a)(1)(C), 982(a); 28 U.S.C. 2461(c)	Forfeiture Allegation	Wire Fraud Forfeiture	Forfeiture of Listed Property.

Date: 14 July 2020

Assistant U.S. Attorney: DARCI W. CRANE

Telephone No.: (208) 334-1211